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MEMORANDUM

TO: Chris Petersen, DPO
EPA Region 6

THRU: Chris Quina, TATL
Region 6 Technical Assistance Team

FROM: Steven Cowan *SC*
Region 6 Technical Assistance Team

DATE: August 23, 1994

REF: TAT Contract Number 68-WO-0037
TDD #: T06-9405-905
PAN #: E06Z170VAA

SUBJECT: Narrative Summary
UpJohn Co-Polymer Chemical Division,
La Porte, Harris County, TX.
CERCLIS #: TXD000017756

INTRODUCTION

The Region 6 Technical Assistance Team (TAT) was tasked by the U. S. Environmental Protection Agency (EPA) to review the existing EPA Region 6 CERCLIS file for UpJohn Co-Polymer Chemical Division so a final decision can be made by EPA as to the site's current CERCLIS status. From the file review relevant Hazard Ranking System (HRS) data was collected, and the site was found to be an active facility and a RCRA Non-filer. Based on the file review, the EPA will make the decision to either conduct further remedial action or to assign the classification of No Further Remedial Action Planned (NFRAP) for the site. This memorandum will briefly describe the information obtained from the file for the UpJohn Co-Polymer Chemical Division site.

SITE HISTORY AND DESCRIPTION

The UpJohn Co-Polymer Chemical Division site, which is located in La Porte, Texas, is an active, 140 acre, chemical manufacturing plant. The facility includes landfarms, surface impoundments, a drum burial area, basins and tanks. A total of 37 solid waste management units (SWMUs) are on-site. The site is under the Texas Department of Water Resources (TDWR) and RCRA jurisdiction. Ground water contamination has been documented in monitoring well samples. Some of the waste are under Class III Closure and some tanks are under Class I Closures. Monitoring wells have also been established for the drum burial site. Monitoring wells samples taken around the drum burial site detected butyl-isocyanate. Benzene and

recycled paper



chlorobenzene have been detected in soil samples collected on-site. Sampling data was conducted by the EPA RCRA branch; however, the site is not listed in the RCRA Database.

REGULATORY STATUS OF SITE

The facility is supposedly active and a RCRA Non-filer as noted in the RCRA Database. A Site Inspection was conducted in 1984. In 1987, a RCRA Facility Assessment Evaluation, Preliminary Review and a Visual Site Inspection were conducted. The State and the Environmental Protection Agency both recommended a Corrective Action Program and a RCRA Facility Investigation for the releases that have occurred at the site.

RELEVANT HRS DATA

The sources at the site are 37 SWMUs some of which are undergoing RCRA supervised closure. A release of hazardous constituents has been documented to the ground water. Chemical analyses of soil samples have detected benzene and chlorobenzene.

Ground water may be used for drinking water in the Harris County area; however, it is not known if drinking water wells are located within the target distance limit of the Ground Water Migration Pathway. Ground water contamination has been detected in on-site monitoring wells.

Target information is not known for the Soil Exposure Pathway and the other two migration pathways.